



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Dame Sue Owen DCB

1. The Committee has been asked to consider an application for Dame Sue Owen DCB, former Permanent Secretary for the Department for Culture, Media and Sport (DCMS) between 1 October 2013 - 24 April 2019. Her last day in service was 24 April 2019.

Application details

2. Dame Sue sought advice on taking up a paid, part-time role as the Chair of Honda European Communication & Consultation Group, for Honda Europe, part of the global Honda Motor Company Limited ("Honda"). Dame Sue said Honda's nature of business was Cars, Motorcycles, Power tools. Honda is a Japanese public multinational conglomerate corporation primarily known as a manufacturer of automobiles, motorcycles, and power equipment.

3. Dame Sue stated the 1994 EU Directive on Communication and Consultation requires companies with 1,000 employees in EU Member States, and with at least 150 employees in two or more participating Member States, to provide Pan-European consultation on a wide range of business issues. Honda thus established a European Communication & Consultation Group (HECCG) in 1995, as a voluntary agreement. The HECCG comprises of two meetings a year, each over 3-4 days, attended by an associate and a management representative from each country Honda operates in and from each facility where there are more than one in a country. Senior management attend from Japan and from European HQ. The meetings take a range of presentations on all aspects of Honda Europe business, finance and strategy, with several Q&A sessions. Around 70 people attend in total. The meetings are chaired by a deliberately external and independent person of reputation and with high integrity and an inclusive approach, with no association with Honda or the industry. She states this role is not part of the formal governance of Honda.

4. Dame Sue confirmed that during her career she has never had any dealings with Honda or the car industry as a whole. She said there is no relationship between DCMS and Honda and she was not responsible for any decisions relating to the company. Dame Sue confirmed that she did not have access to commercially sensitive information on competitors.

5. DCMS countersigned this application. DCMS confirmed that it has no relationship with Honda. It stated there is no connection between Dame Sue's former official role in government and the new role and as such it is unlikely to be perceived as a reward. Dame Sue has not had any previous official involvement with Honda or any of its competitors. As a result she has

no access to commercially sensitive information or access to policy or departmental information that would give Honda an unfair advantage. It has no reservations about the approval of this appointment.

The Committee's Consideration

6. The Committee noted that Dame Sue had no contact with Honda; made no policy or commercial decisions on the company or the sector and was not responsible for anyone who did. Therefore, the Committee considered the risk this commission could reasonably be perceived as a reward for actions taken while in office was low.

7. The Committee noted that as the former Permanent Secretary, Dame Sue would have had access to sensitive information on a broad range of issues which would be relevant to many companies. However, there is no connection between her proposed role and her time in service, which is reinforced by the fact this role specifically requires an external and independent applicant. As such the Committee considered the risks associated with her access to sensitive information are low. This was confirmed by the department's comments that Dame Sue did not have access to commercially sensitive information that would unfairly benefit Honda. These mitigating factors help minimise the risk in this case and the Committee considered the standard restriction on using privileged information will mitigate any further risk.

8. The Committee noted that, due to her seniority as former Permanent Secretary, there is a risk Dame Sue may offer an unfair advantage to Honda in relation to access to the contacts she gained while in service. The lobbying ban imposed below makes clear that it would be inappropriate for her to use her contacts across Government and Whitehall to the unfair advantage of Honda. Further, to mitigate any risk Honda may ask for input into any future business with the government, the Committee has imposed a ban on providing advice relating to the work of the UK Government. The Committee noted this is not Dame Sue's intention as Chair and this restriction is in keeping with her role as described.

9. The Prime Minister, under the Government's Business Appointment Rules, has accepted the Committee's advice that Dame Sue Owen's role with **Honda** should be subject to the following conditions:

- that she should not draw on (disclose or use for the benefit of herself or the organisations to which this advice refers) any privileged information available to her from her time in office;
- for two years from her last day in Crown service she should not become personally involved in lobbying the Government on behalf of Honda (including clients, parent companies, subsidiaries and partners). Nor should she make use, directly or indirectly, of her government and/or Ministerial contacts to influence policy, secure funding/business or otherwise unfairly benefit Honda (including clients, parent companies, subsidiaries and partners); and
- for two years from her last day in Crown service, she should not provide advice to Honda on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the Government.

10. By 'privileged information' we mean official information to which a Minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made publicly available. Applicants are also reminded that they may be subject to

other duties of confidentiality, whether under the Official Secrets Act, the Civil Service Code or otherwise.

11. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/Minister *“should not engage in communication with Government (Ministers, civil servants, including special advisers, and other relevant officials/public office holders) – wherever it takes place - with a view to influencing a Government decision, policy or contract award/grant in relation to their own interests or the interests of the organisation by which they are employed, or to whom they are contracted or with which they hold office.”*

12. I should be grateful if you would inform us as soon as Dame Sue Owen takes up this appointment, or if it is announced that Dame Sue Owen will do so, either by returning the enclosed form or by emailing the office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments that have not been taken up or announced. This could lead to a false assumption being made about whether Dame Sue Owen has complied with the Rules.

13. Please also inform us if Dame Sue Owen proposes to extend or otherwise change the nature of appointment as, depending on the circumstances, it may be necessary for her to make a fresh application.

14. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee’s website, and where appropriate, refer to it in the relevant annual report.

Isabella Wynn
Committee Secretariat